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R. SHAH, MD, LTD.; and RADAR  
MEDICAL GROUP, LLP dba UNIVERSITY  
URGENT CARE

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALLSTATE INSURANCE COMPANY,  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY, ALLSTATE  
INDEMNITY COMPANY, and ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

Plaintiffs,

vs.

RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,  
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI  
R. SHAH, MD, LTD.; and RADAR MEDICAL  
GROUP, LLP dba UNIVERSITY URGENT  
CARE, Does 1-100, and ROES 101-200,

Defendants.

AND RELATED CLAIMS.

Case No. 2:15-cv-01786-APG-CWH

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION FOR  
SANCTIONS PURSUANT TO FRCP 11**

**(Second Request)**

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (the “Allstate Parties”), and  
4 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RADAR  
5 MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH, MD, LTD.,  
6 and DIPTI R. SHAH, MD, LTD. (the “Radar Parties”), by and through their respective attorneys of  
7 record, stipulate and agree, pursuant to an agreement reached on April 11, 2018, as follows:

8 1. On March 16, 2018, the Allstate Parties filed their Motion for Sanctions Pursuant to  
9 FRCP 11 [ECF No. 263] (the “Motion”);

10 2. Pursuant to the parties’ March 27, 2017 Stipulation [ECF No. 267], which was  
11 granted by the Court by Order dated March 28, 2018 [ECF No. 268], the Radar Parties presently  
12 have until April 13, 2018 to file their Opposition to the Motion;

13 3. In order to fully address the issues presented, and due to additional scheduling  
14 conflicts for the Radar Parties’ counsel, the Radar Parties shall now have up to and including April  
15 20, 2018 to file their Opposition to the Motion; and

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4. This is the second stipulation to extend the deadline to file the Opposition to the Motion. No further extension will be sought by the Radar Parties. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 13<sup>th</sup> day of April, 2018.

DATED this 13<sup>th</sup> day of April, 2018.

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore

By: /s/ Todd W. Baxter

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**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE  
Dated: April 20, 2018.